

September 27, 2001

Don Sloma, Executive Director
Washington State Board of Health
Post Office Box 47990
Olympia, Washington 98405-7990

Dear Mr. Sloma:

The Department of Health has reviewed Chapter 246-272 WAC, On-Site Sewage System Rules and Regulations of the State Board of Health (SBOH), and has determined that these rules need to be revised. To assist the department and the SBOH in setting the stage for revising these rules, the department convened the On-Site Advisory Committee (OAC). The OAC was charged with reviewing the scope, purpose, and elements of the Wastewater Management Program and advising the department.

The OAC has completed their work and have developed 55 recommendations for program improvement and re-direction. Although the committee noted the importance of all of their recommendations, they prioritized recommendations in three areas to assist the department in identifying which initiatives to pursue first. The Executive Summary of the Draft report from the committee, which describes the three priority areas, is included with this letter. We anticipate finalizing the committee's report by the October SBOH meeting.

We would like the opportunity to address the Board with the following items:

1. Our plan for implementing the recommendations of the OAC.
2. Our strategy for the rule development process: committee make-up and process, assignment of staff resources, and timeline.
3. SBOH involvement in the rule development process.

If you have any questions, please contact Maryanne Guichard at 360/236-3391.

Sincerely,

Bill White, Assistant Secretary
Environmental Health Programs

Enclosure

cc: Maryanne Guichard
Mark Soltman

On-Site Advisory Committee

Executive Summary

Background – In October 2000, the Department of Health’s Office of Environmental Health and Safety convened the On-Site Wastewater Advisory Committee (OAC) to advise the Department on policy matters relating to the Wastewater Management Program. The OAC is comprised of stakeholder representatives from federal, state and local government agencies, academia, the private sector, and the public. The charge of the OAC was to:

1. Assist the Department of Health in scoping the future of the on-site wastewater management program
2. Establish a clear and mutually understood direction for the future before the Department undertakes a new round of rule modification, and
3. Look at the Department of Health’s program and generate a written report with recommendations.

Recommendations – The committee met from October 2000 through June 2001, and developed 55 policy-related recommendations for changing, enhancing, and re-directing the department's Wastewater Management Program. Although the committee noted the importance of all of their recommendations, they prioritized recommendations in the following three areas to assist the Department in identifying which initiatives to pursue first.

1. **O&M Initiatives:** From the first meeting to the last, issues and concerns about long-term operation and maintenance of on-site sewage systems were the highest priority of the OAC. Members of the committee are fully aware of the need to continue to develop management methods and support systems to assure timely, appropriate, and cost-effective monitoring and maintenance of on-site sewage systems. The committee, through their discussions and recommendations, promotes the development of public sector / private sector partnerships in implementing O&M management systems characterized by a risk-based model approach, strong linkages with private-sector monitoring, data collection and reporting. To promote effective, coordinated efforts in this arena the OAC recommends the establishment of a position dedicated to developing the linkages between agencies, organizations, and practitioners involved in operating, maintaining, and monitoring on-site sewage systems.
2. **Rule Development Initiatives:** Second to the concerns and discussions about O&M, the committee repeatedly expressed their agreement that implementation of most of the recommendations developed by the committee is dependent upon the development of new and revised on-site sewage system rules. In support of observation the committee has recommended that the department dedicate the resources necessary to initiate a rule development process that is effective, timely, and responsive to the recommendations of the OAC and other stakeholders.
3. **Funding Initiatives:** The OAC identified several areas where progress in the long-term effective use on on-site sewage systems is hampered by lack of adequate funding. Three areas of particular concern resulting in recommendations for the Department to seek solutions were:
 - Repair and replacement of failing on-site sewage systems.
 - Development of local O&M management programs (to offset cost of developing infrastructure, e.g. Computer systems)
 - LOSS program fees (fail to recoup the costs of services provided).

Implementation — To implement the OAC recommendations with existing program resource capacity the department must:

- Schedule activities, implementing some recommendations before others;
- Balance staff workloads (de-emphasize some program elements in order to emphasize other program elements and new program initiatives); and,
- Re-direct program funding resources to meet the financial needs of implementing some of the recommendations (such as meeting the costs associated with the development of new on-site sewage system rules-committee support and facilitation).